

# CATEGORY 1

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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C    05000251  
AUTH. NAME    AUTHOR AFFILIATION  
LUNKETT, T.F.    Florida Power & Light Co.  
RECIP. NAME    RECIPIENT AFFILIATION  
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 970628 ltr re violations noted in insp repts  
50-250/97-06 & 50-251/97-06. Corrective actions: matl placed  
under control of licensee & bulk releases stopped pending  
completion of plant policy.

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AUG 20 1997

L-97-203  
10 CFR 2.201

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Re: Turkey Point Units 3 & 4  
Docket Nos. 50-250/251  
Reply to Notice of Violation  
NRC Inspection Report 97-06

Florida Power & Light Company has reviewed the subject inspection report and, pursuant to 10 CFR 2.201, the required response is attached.

If there are any questions, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'T. F. Plunkett'.

T. F. Plunkett  
President  
Nuclear Division

CLM

Attachment

cc: Luis A. Reyes, Regional Administrator, Region II, USNRC  
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant

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## REPLY TO NOTICE OF VIOLATION

RE: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
NRC Inspection Report 97-06

### FINDING

"During an NRC inspection completed on June 28, 1997, a violation of NRC requirements was identified. In accordance with the 'General Statement of Policy and Procedures for NRC Enforcement Actions, NUREG-1600,' the violation is listed below:

Title 10 CFR Part 20.1801 requires the licensee to secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas.

Title 10 CFR Part 20.1802 requires the licensee to control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage.

10 CFR Part 20.1003, defines Survey as an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation. When appropriate, such an evaluation includes a physical survey of the location of radioactive material and measurements or calculations of levels of radiation, or concentrations or quantities of radioactive material present.

Title 10 CFR Part 20.1501(a), requires, in part, that 'each licensee shall make or cause to be made, surveys that - (1) may be necessary for the licensee to comply with the regulations in this part; and (2) are reasonable under the circumstances to evaluate (i) the extent of radiation levels; and (ii) concentrations or quantities of radioactive material; and (iii) the potential radiological hazards that could be present.'

Contrary to the above, on March 25, 1997, the licensee failed to control licensed byproduct materials and make adequate contamination surveys of contaminated painting equipment released from the licensee's Radiation Control Area.

Contrary to the above, on June 3, 1997, the licensee failed to control licensed byproduct materials and make adequate contamination surveys of 3A Component Cooling Water Heat Exchanger tubes released from the licensee's Radiation Control Area.



The regulations applicable to nuclear power reactor licensees do not provide for release of materials for unrestricted use that are known to be radioactively contaminated at any level.

This is a Severity Level IV violation (Supplement IV)."

#### RESPONSE TO FINDING

1. Florida Power & Light Company (FPL) concurs with the finding.
2. Reason for the violation:

The two events which resulted in the violation were due to deficiencies in the material release program. The program deficiencies involved in the release of contaminated painting equipment included inadequate guidance on the release of porous materials, a material release area which did not provide optimum conditions for ensuring a thorough survey, no requirement to count smears on a scaler, and inadequate information on the release record.

The release of contaminated Component Cooling Water (CCW) Heat Exchanger tubes was due to program deficiencies and poor communication of critical information ( loss of the records of positive sample results, and incorrect information concerning system contamination history).

A bulk release protocol had been established for releasing the CCW tubes, and the established practice was to take one sample of tube cuttings for counting on a Multi Channel Analyzer. For this particular release, two cutting samples were taken and counted. One showed no activity, one showed a very low level of Cobalt-60 activity ( $1.78 \text{ E-4 uCi/l}$ ). The activity was confirmed with a recount ( $1.84 \text{ E-4 uCi/l}$ ). Although the HP technician reported placing all sample reports on the supervisor's desk (but not clipped together), the supervisor reported finding only one report, showing no activity. Since past practice had been to take only one sample, the supervisor approved the release of the tubes based on the report of no activity. The sample reports which showed Cobalt-60 activity have not been recovered.

The bulk release protocol established for the tubes was based partly on individual recollection that a two-year chemistry history of the CCW system showed no radioactivity. Contrary to this, low levels of Sodium-24 ( $1.38 \text{ E-7 uCi/cc}$ ) and Cesium-137 ( $2.24 \text{ E-7 uCi/cc}$ ) had been found in CCW water in August, 1995.



3. Corrective steps which have been taken and the results achieved:

In both cases the material was placed under the control of a licensee after discovery of the radioactivity. The painting equipment remained at Braidwood, and the CCW tubes were returned to Turkey Point.

Bulk releases have been stopped pending completion of a plant policy which requires a "bulk release permit." That permit will detail, for the specific bulk release contemplated, what samples must be taken, and what sampling methods and instruments are to be used.

State of the art Small Articles Monitors and large area beta scintillation detectors have been purchased and placed in use at the Access Control Area. A scaler is also available at the Access Control Area, and is now required for counting smears for free release of material.

Turkey Point has issued a new policy governing release of material from the Radiation Controlled Area (RCA). The policy requires the approval of HP supervision to allow porous material into the RCA, and the approval of the HP Supervisor to release porous material if it cannot be surveyed in a Small Articles Monitor. Material Release records now include the survey location, survey instrument information, and survey results. Additionally, specific guidance has been proceduralized on the handling and communication of sample results, to prevent recurrence of events such as the inadvertent release of the CCW tubes.

Physical improvements have been made to the alternate material release area ("Gate 50") to ensure adequate lighting and working conditions. Turkey Point's current policy requires adequate lighting for any release from the alternate material release area.

Corrective actions for the second event include actions by management to ensure the Condition Report Program is followed consistently and aggressively when problems are discovered. The need for prompt corrective action when dealing with the potential loss of control of radioactive material, and the need for prompt Condition Reports with complete information, have been stressed in meetings with department personnel.

Individual(s) associated with the erroneous chemistry history have been counseled on the requirement for accurate information on which to base releases.





4. Corrective actions which will be taken to prevent further violations:

Deficiencies discussed in the inspection report and corrective actions described herein have been covered in HP Department meetings, and will be communicated to incoming vendor HP technicians, as they are brought in for the upcoming refueling outage. All radiation workers at Turkey Point are receiving training on radioactive material control and contamination control in the ongoing annual Radiation Controlled Area (RCA) requalification training.

A new Health Physics/Chemistry Supervisor has been hired, and has been tasked with strengthening the performance and communications in the department.

A site survey program is underway to confirm the absence of contaminated material improperly released from the RCA.

Quality Assurance will pay increased attention to the radioactive material control program, and supervisory observations of material release activities have been increased.

The effectiveness of these actions will be monitored during the upcoming year to verify that material leaving the RCA is surveyed in accordance with program requirements. The Health Physics/Chemistry Supervisor will provide a written report to plant management verifying the effectiveness of the corrective actions, and offering any additional actions needed.

5. The date when full compliance was or will be achieved:

Full compliance was achieved on June 16, 1997, when the CCW tubes were returned to Turkey Point.